

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: THE CASES LISTED BELOW	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

<i>Mullins, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-02952
<i>Sprout, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-07924
<i>Iquinto v. Ethicon, Inc., et al.</i>	2:12-cv-09765
<i>Daniel, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-02565
<i>Dillon, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-02919
<i>Webb, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-04517
<i>Martinez v. Ethicon, Inc., et al.</i>	2:13-cv-04730
<i>McIntyre, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-07283
<i>Oxley v. Ethicon, Inc., et al.</i>	2:13-cv-10150
<i>Atkins, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-11022
<i>Garcia v. Ethicon, Inc., et al.</i>	2:13-cv-14355
<i>Lowe v. Ethicon, Inc., et al.</i>	2:13-cv-14718
<i>Dameron, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-14799
<i>Vanbuskir, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-16183
<i>Mullens, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-16564
<i>Shears, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-17012
<i>Javins, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-18479
<i>Barr, et al. v. Ethicon, Inc., et al.</i>	2:13-cv-22606
<i>Lambert v. Ethicon, Inc., et al.</i>	2:13-cv-24393
<i>Cook v. Ethicon, Inc., et al.</i>	2:13-cv-29260
<i>Stevens v. Ethicon, Inc., et al.</i>	2:13-cv-29918
<i>Harmon v. Ethicon, Inc., et al.</i>	2:13-cv-31818
<i>Snodgrass v. Ethicon, Inc., et al.</i>	2:13-cv-31881
<i>Miller v. Ethicon, Inc., et al.</i>	2:13-cv-32627
<i>Matney, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-09195
<i>Jones, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-09517
<i>Humbert v. Ethicon, Inc., et al.</i>	2:14-cv-10640
<i>Gillum, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-12756
<i>Whisner, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-13023

<i>Tomblin v. Ethicon, Inc., et al.</i>	2:14-cv-14664
<i>Schepleng v. Ethicon, Inc., et al.</i>	2:14-cv-16061
<i>Tyler, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-19110
<i>Kelly, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-22079
<i>Lundell v. Ethicon, Inc., et al.</i>	2:14-cv-24911
<i>Cheshire, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-24999
<i>Burgoyne, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-28620
<i>Bennett, et al. v. Ethicon, Inc., et al.</i>	2:14-cv-29624

**NOTICE OF VIDEOTAPED DEPOSITION PURSUANT TO RULE 30 AND DOCUMENT
REQUESTS PURSUANT TO RULE 34 OF STEPHANIE BENIGHT, PH.D.**

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, and the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Plaintiffs, through their undersigned attorneys, will take the deposition of **Stephanie Benight, Ph.D.** via oral examination on **October 13, 2015 at 11:00 a.m. PST** at **530 Lytton Avenue, 2nd Floor, CA 94301** before a certified court reporter. The deposition, if not completed on the specific date, will continue on a mutually agreeable date from day-to-day, excluding Saturdays, Sundays, and court-recognized holidays, until the examination is completed.

PLEASE TAKE FURTHER NOTICE that the person to be examined is required to produce any document reviewed by the deponent, prior to the commencement of the deposition, to prepare for the deposition and/or to refresh the deponent's recollection regarding the facts of this case, as well as all documents requested on Schedule A.

The deposition will be taken before a notary public or other officer authorized to administer oaths, for the purposes of discovery, for use at trial, or for such other purpose as permitted by the Federal Rules of Procedure. The deposition will be recorded by stenographic means and videotaped.

Dated: October 7, 2015

Respectfully submitted,

/s/ Daniel Thornburgh_____

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SCHEDULE A

1. All documents, photographs, microphotographs, Scanning Electron Microscopy, data, test results, and notes, including but not limited to your lab notebook, related to the work you or your employer, Exponent or any third party performed at the request of Butler Snow, Ethicon or Dr. Steven MacLean concerning the tests, studies or experiments performed by you or Exponent to intentionally degrade the TVT device using chemicals, UV radiation or any other method used to intentionally degrade the TVT device.
2. All chain of custody documents related to all studies, tests or experiments performed by you or Exponent to intentionally degrade the TVT device using chemicals, UV radiation or any other method used to intentionally degrade the TVT device.
3. All protocols used in the TVT studies, tests or experiments to intentionally degrade the TVT device using chemicals, UV radiation or any other method used to intentionally degrade the TVT device.
4. All histology slides in your or Exponents possession, custody or control concerning the studies, tests or experiments performed by you or Exponent to intentionally degrade the TVT device using chemicals, UV radiation or any other method used to intentionally degrade the TVT device.
5. All other documents or data in your possession concerning the studies, tests or experiments performed by you or Exponent to intentionally degrade the TVT device using chemicals, UV radiation or any other method used to intentionally degrade the TVT device.

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2015, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Daniel Thornburgh
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